

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Green Plains Otter Tail LLC
24096 170th Avenue
Fergus Falls, Minnesota 56537**

ATTENTION:

**Anthony J. Hicks
General Manager**

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency (EPA) is requiring Green Plains Otter Tail LLC (Green Plains or you) to submit certain information about your facility at 24096 170th Avenue, Fergus Falls, Minnesota. Appendix C specifies the information that you must submit. Appendix B specifies the instructions needed to answer this information request. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the Act), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Green Plains owns and operates an emission source at your Fergus Falls, Minnesota facility. We are requesting this information to determine whether your emission source is complying with the Minnesota State Implementation Plan.

You must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Under 40 C.F.R. Part 2, Subpart B, you may assert a claim of business confidentiality for any portion of the submitted information. You must specify the page, paragraph, and sentence when identifying the information subject to your claim. Appendix A specifies the assertion and substantiation requirements for business confidentiality claims. Green Plains must submit all requested information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

We may use any information submitted in response to this request in an administrative, civil, or criminal action.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation. To aid in our electronic recordkeeping efforts, EPA requests that you provide all documents responsive to this request in an electronic format in accordance with a. through f., below. These submissions are in lieu of hard copy.

a. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the

document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.

b. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

c. Provide submission on physical media such as compact disk, flash drive or other similar item.

d. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).

e. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please also mark each page that is confidential business information as such.

f. Certify that the attached files have been scanned for viruses and indicate what program was used.

Failure to comply fully with this request for information may subject Green Plains to an enforcement action under Section 113 of the Act, 42 U.S.C. § 7413.

You should direct any questions about this request for information to Molly DeSalle at
(312) 353-8873.

Date

9/6/11

Cheryl L. Newton

Director

Air and Radiation Division

Appendix A

Confidential Business Information (CBI) Assertion and Substantiation Requirements

A. Assertion Requirements

You may assert a business confidentiality claim covering any part of the information requested in the attached letter, as provided in 40 C.F.R. § 2.203(b). To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document over which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a legend to indicate the intent to claim confidentiality. The stamped or typed legend or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by the United States Environmental Protection Agency (EPA) only to the extent permitted and by means of the procedures set forth by Section 114(c) of the Clean Air Act (the Act), 42 U.S.C. § 7414, and 40 C.F.R Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the attached letter as a waiver of that claim, and the information may be made available to the public without further notice to you.

Please segregate personnel, medical and similar files from your responses and include that information on separate sheet(s) marked as “Personal Privacy Information” given that disclosure of such information to the general public may constitute an invasion of privacy.

B. Substantiation Requirements

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208 which provides in part that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; and that the information is not and has not been reasonably obtainable by legitimate means without your consent.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking you to substantiate fully your CBI claim. If you receive such a letter, you must provide EPA with a response within the number of days set forth in the EPA request letter. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential. **You must be specific by page, paragraph, and sentence when identifying the information subject to your claim.** Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class information that you identify as being subject to CBI, you must answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Any other issue you deem relevant.

Please note that emission data provided under Section 114 of the Act, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2. "Emission data" means, with reference to any source of emission of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which,

under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. §§ 2.301 (a)(2)(i)(A), (B) and (C).

Emission data includes, but is not limited to, service records stating the amount of refrigerant added to a unit or reclaimed from a unit.

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Appendix B

When providing the information requested in Appendix C, use the following instructions and definitions.

INSTRUCTIONS

1. Provide a separate narrative response to each question and subpart of a question set forth in the information request.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) that provided information that was used or considered in responding to that question, as well as each person that was consulted in the preparation of that response.
3. Indicate on each document produced in response to this information request, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where documents or information necessary for a response are neither in your possession nor available to you, indicate in your response why such documents or information is not available or in your possession and identify any source that either possesses or is likely to possess such information.

DEFINITIONS

All terms used in this request for information will have their ordinary meaning unless such terms are defined in the Act, 42 U.S.C. §§ 7401 et seq., 40 C.F.R. Part 52 (which incorporates the federally-approved State Implementation Plan), or other Clean Air Act implementing regulations. Reference is made to the EPA regulatory provisions only; however, you should apply the applicable federally-approved state provisions, when appropriate. Definitional clarification is specified below.

1. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms “relate to” or “pertain to” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

Appendix C

Green Plains Otter Tail LLC (Green Plains) must submit the following information to the U.S. Environmental Protection Agency for the facility at 24096 170th Avenue, Fergus Falls, Minnesota (facility) within 30 calendar days pursuant to Section 114 of the Clean Air Act, 42 U.S.C. § 7414.

- (1) Provide the name and address of the original owner and/or operator of the facility. Specify when Green Plains acquired or otherwise became owner of the facility, and identify the individual(s), corporation(s) or other entities from whom the facility was acquired. Explain if Green Plains has any corporate, partnership or other business relationships or affiliations with any previous owner or operator of the facility, and if so, provide a complete description of such relationship and affiliation. Provide a list of current owners and the current corresponding ownership stake in the facility.
- (2) Provide the following information related to grain, from the time period from the facility's first day of operation to present:
 - a. Grain received (tons/month);
 - b. Grain in storage (tons);
 - c. Grained processed, based on amount received adjusted for change in amount stored (tons/month);
 - d. Grain processed;
 - e. Facility's total permanent grain storage capacity; and
 - f. Identify whether the facility is subject to 40 C.F.R. 60, Subpart DD, Standards of Performance for Grain Elevators.
- (3) Provide documentation demonstrating the total Dry Distillers Grain (DDG) production at the facility in terms of dry feed or dry feed equivalent in tons per month and tons per year, from the time period from the facility's first day of operation to present.
- (4) Provide documentation demonstrating the total Wet Distillers Grain (WDG) production at the facility in terms of dry feed or dry feed equivalent in tons per month and tons per year, from the time period from the facility's first day of operation to present.
- (5) Provide documentation demonstrating the total fuel grade ethanol production (200 proof) at the facility in terms of million gallons per month and million gallons per year, from the time period from the facility's first day of operation to present.
- (6) Provide documentation demonstrating the total natural gas usage by the facility in million cubic feet per month and million cubic feet per year, from the time period from the facility's first day of operation to present.
- (7) Provide the actual annual emissions reported to the Minnesota Pollution Control Agency (MPCA) for the facility, for the from the time period from the facility's first day of operation to present. Provide the method for the annual emissions calculations,

including the basis of any emissions factors used, and a copy of the reports. This should include all pollutants reported to the MPCA.

- (8) Provide an electronic Excel workbook with the complete, facility-wide potential to emit calculations. Include in the response a written description of how each column in the Excel workbook is generated. Additionally, provide copies of the following records related to all emissions from the facility, from the time period from the facility's first day of operation to present:
 - a. Documentation used to establish the emission rates or factors and maximum hourly emission rates for emissions of different pollutants used by the facility to determine emissions of the various process units and all other emission points at the facility;
 - b. Records of all other data used or relied upon by the facility to determine the emissions of the process units and other emission points, including physical and chemical constants; and
 - c. Records for upsets in the operation of any process units (e.g. feed dryers) that could generate additional emissions, with a description of the incident, explanation, and corrective actions and any preventative measures taken, and an estimate of the additional emissions that occurred, with supporting calculations and background information.
- (9) Provide a list and copies of each stack test conducted on any emissions unit for any reason at the facility, from the time period from the facility's first day of operation to present. Include all test runs, even if a full test series was not completed. In the response, clearly identify the emissions unit; specify the date of the test, and test method(s) used. Emissions testing includes, but is not limited to, compliance testing, engineering testing, and testing for general information. Also provide a copy of any report that resulted from the emissions test that meets the above criteria. Indicate whether such report was shared with the local and/or state permitting agency. A copy of the summary pages from each report is not sufficient. Provide copies of the entire report. Provide all calculations relative to the stack test, and provide copies of the full test report, including the section describing the process parameters and production or processing rates at the time of the test. Also, provide copies of any reports of visible emission observations conducted during each test. For each test during which the source was not operating at maximum design capacity, provide an explanation why production was limited.
- (10) Provide copies of manufacturer specifications for all RTO/TOs at the facility. Specifications must include a diagram of the entire unit and any filters or particulate capture systems the unit utilizes to prevent particulate build up. If filters are a part of the facility's RTO/TOs, provide a date (DD/MM/YYYY) and description of any issues the facility has had with the internal filters.
- (11) Provide the following information for each boiler at the facility, from the time period from the facility's first day of operation to present:

- a. Identify if the boiler is an “affected” boiler under 40 C.F.R. 60, Subpart Db, the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating units;
 - b. Identify if the boiler is an “affected” boiler under 40 C.F.R. 63, Subpart DDDDD, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial-Commercial-Institutional boilers and process heaters;
 - c. Identify the fuel used in the boiler;
 - d. The design heat capacity/input (mmBTU/hour);
 - e. All oxygen levels, measured in the flue gas (in hourly averages, on a dry basis);
 - f. Any permit deviation reports, including start-up, shut-down and malfunction; and
 - g. Operating hours in hours per month and hours per year.
- (12) Provide the following information for each baghouse at the facility, from the time period from the facility’s first day of operation to present:
- a. A copy of the manufacturer’s specifications and recommended operating and maintenance procedures;
 - b. All records of the differential pressure reads taken at each baghouse;
 - c. All inspection, maintenance, and repair logs;
 - d. Identify if a fixed stack damper is installed, and list the installation date and the acfm the unit restricts flow to;
 - e. All records from any continuous monitoring devices used to monitor flow rates (acfm) of direct discharge to the atmosphere from the baghouse;
 - f. Documentation to confirm fabric filters emission limit in grain per standard cubic feet (gr/scf);
 - g. Documentation of how the emissions factors were derived and maximum hourly emission rates used by the facility to determine PM emissions, if not specifically detailed in permit application; and
 - h. Any excess opacity or opacity deviation reports, including start-up, shut-down and malfunction.
- (13) Provide copies of manufacturer specifications for all scrubbers at the facility. Provide the following information for each scrubber at the facility, f from the time period from the facility’s first day of operation to present:
- a. Minimum scrubber water flow rate (hourly average);
 - b. Maximum scrubber water outlet temperature (⁰F, hourly average);
 - c. Maximum scrubber exhaust gas outlet temperature (⁰F, hourly average);
 - d. Type and minimum usage rate of scrubbing additive for control of acetaldehyde (gallons per day);
 - e. Pressure drop (inches of water column);
 - f. Any permit deviation reports, including start-up, shut-down and malfunction reports; and
 - g. Inspection, maintenance, and repair logs.

- (14) Provide the following information for each RTO/TO at the facility, from the time period from the facility's first day of operation to present:
- Documentation demonstrating if the RTO/TO is a regenerative or recuperative RTO/TO;
 - Rated firing capacity of each fuel burner (mmBtu/hour);
 - Monthly natural gas usage records (in cubic feet per month);
 - Hourly temperature readings, in an Excel Workbook, including date and time of readings;
 - Records from the monitoring system used to monitor the valve or damper position on the flow of each control device directing towards various exhaust streams to the RTO/TO;
 - Most recent efficiency testing results and date of efficiency test;
 - Describe any maintenance issues the facility has needed to correct since the construction and operation of the unit; and
 - Any permit deviation reports, including start-up, shut-down and malfunction.
- (15) For the facility's leak detection and repair program, provide the following, from the time period from the facility's first day of operation to present:
- A copy of all applicable notifications and reporting documents required by 40 C.F.R. § 60.487;
 - Any permit deviation reports; and
 - A copy of the most recent semi-annual compliance report, which lists all components tested and the status of each component.
- (16) Provide copies of the following operating log(s), from the time period from the facility's first day of operation to present:
- For process units controlled by an RTO/TO, the operating levels of the units during periods when units operated when the RTO/TO was out of service or was experiencing an upset or malfunction; and
 - For feed dryers (including cooling drum), periods when feed is present in a dryer while the associated RTO/TO not in operation.
- (17) Provide the following information about the feed drying, feed cooling and load out process, if not already included in response to Question 8:
- Identify all cyclones for the feed dryers by identification number;
 - A copy of the manufacturer's specifications and recommended operating and maintenance procedures for the cyclones;
 - Efficiency rate of the cyclones;
 - If emissions from feed cooling drum are handled by a baghouse and an RTO/TO, provide the percentage of feed cooling drum air flow handled by RTO/TO and if the facility can adjust to volume of air the RTO/TO receives from the feed cooling drum;

- e. Records of the monthly and annual particulate matter (PM), volatile organic compounds (VOC), and hazardous air pollutant (HAP) emissions from the feed cooling and transport system, with supporting calculations;
 - f. Records of the monthly and annual PM emissions from the DDG load out system, with supporting calculations; and
 - g. Records of the monthly and annual VOC and HAP emissions from WDG transfer and load out, with supporting calculations.
- (18) Provide a copy of the facility's Startup, Shut-down, Malfunction Plan.
- (19) A list and copies of all air permits and permit applications, including any permits to construct, to operate, or orders issued. In the list:
- a. Specify the date of permit issuance;
 - b. Provide a list of equipment that was modified or constructed pursuant to the permit;
 - c. State whether the permit is minor new source review (minor NSR), prevention of significant deterioration (PSD), major non-attainment NSR permit or other type of permit; and
 - d. If a permit is a PSD or major non-attainment NSR permit, specify the pollutants for which such permit was issued.
- (20) Provide any and all documentation, including, but not limited to, emails and meeting notes, relating to all openings located on top of the facility's fermentation tanks and beer well. Include in the response a list detailing the date, time and duration of any venting from the openings (pressure relief valves, man-ways, etc.) on top of the fermentation tanks and beer well.
- (21) Provide documentation concerning the status of continuous emissions monitoring system (CEMS) at the facility. If no CEMS are operated at the facility, provide documentation as such.

CERTIFICATE OF MAILING

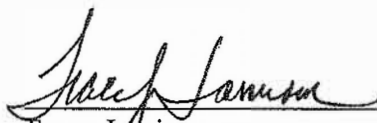
I, Tracy Jamison, certify that I sent a Request to Provide Information Pursuant to the
Clean Air Act by Certified Mail, Return Receipt Requested, to:

Anthony J. Hicks
Green Plains Otter Tail LLC
24096 170th Avenue
Fergus Falls, Minnesota 56537

I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by First-Class Mail to:

Jeff T. Connell, Manager
Air Quality Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155

On the 7th day of September 2011.


Tracy Jamison
Office Automation Assistant
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER:

7009 1680 0000 7670 4762

Standard bcc's:

Official File Copy w/Attachment (s)

Other bcc's:

Originating Organization Reading File w/Attachment(s)

Cynthia King, C-14J